

# Exhibit D

**From:** [Luo, Cynthia](#)  
**To:** [Ed Sivin](#)  
**Cc:** [gmiller@sivinandmiller.com](mailto:gmiller@sivinandmiller.com); [David Roche](#)  
**Subject:** Reese v. Williamson, et al., 22-cv-10494  
**Date:** Wednesday, August 23, 2023 3:17:00 PM  
**Attachments:** [REESE-DEF 000016-000048.zip](#)  
[Reese - Cover Letter re 8-23-2023 Production.pdf](#)  
[Reese - Def. Response to Plaintiff's Interrogatories.pdf](#)  
[Reese - Draft Protective Order.docx](#)  
[Reese - Def. Response to Plaintiff's Doc Requests.pdf](#)

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Counsel,

Please see attached.

Best,  
Cynthia

**S. Cynthia Luo (she/her) | Assistant Attorney General**

Litigation Bureau | New York State Office of the Attorney General

28 Liberty Street | New York, New York 10005

Tel: (212) 416-8037 | [cynthia.luo@ag.ny.gov](mailto:cynthia.luo@ag.ny.gov)



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-8037

August 23, 2023

**Via Email**

Edward Sivin, Esq.  
Sivin, Miller & Roche LLP  
20 Vesey Street, Suite 1400  
New York, NY 10007  
[esivin@sivinandmiller.com](mailto:esivin@sivinandmiller.com)

Re: Reese v. Williamson, et al., 22 Civ. 10494 (PMH)

Dear Mr. Sivin:

The following items are enclosed:

- 1) Defendants' Response to Plaintiff's Interrogatories;
- 2) Defendants' Response to Plaintiff's Request for The Production of Documents;
- 3) Files bearing the Bates numbers REESE-DEF 000016 – 000048;
- 4) HIPAA Release Authorization (to be completed and returned); and
- 5) Defendants' draft Protective Order.

Regarding the HIPAA release authorization and draft protective order, please review and return to me at your earliest convenience. Documents currently being withheld in anticipation of those completed documents will be produced as soon as practicable after I am in receipt of the authorization and executed protective order.

Please also let me know of Mr. Reese's availability for a deposition during the week of September 25.

Respectfully,

/s/ S. Cynthia Luo  
S. Cynthia Luo  
Assistant Attorney General  
28 Liberty Street, 18<sup>th</sup> Floor  
New York, NY 10005  
(212) 416-8037  
[cynthia.luo@ag.ny.gov](mailto:cynthia.luo@ag.ny.gov)